

1  
2  
3  
4  
5  
6  
7 **IN THE UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**  
9

10 ULTRAMAX PRODUCTS LTD., a  
11 United Kingdom Limited Company.

12 Plaintiff,

13 vs.

14 ANTHONY MICHAEL MITCHELL,  
15 An individual residing in Nevada

16 Defendant.  
17

**JOINT STIPULATION AND  
MOTION FOR ENTRY OF  
DISMISSAL**

Case No.: **2:18-cv-01862-RCJ-DJA**

18 **STIPULATION OF DISMISSAL**  
19

20 Pursuant to FED. R. CIV. P. 41(a)(1)(A)(ii), Plaintiff Ultramax Products Ltd.,  
21 (“UMP” or “Plaintiff”) and Defendant Anthony Michael Mitchell (“Mitchell” or  
22 “Defendant”) respectfully stipulate to and jointly move the Court for Entry of  
23 Dismissal as to all Counts of the Complaint (Dkt. 1) with prejudice, subject to  
24 Defendant’s compliance with the Confidential Settlement Agreement (“CSA”) to be  
25

1 filed with the court under seal and the terms of which are incorporated by reference  
2 into the order of dismissal.

3 NOW THEREFORE, in reliance upon the representations and warranties  
4 made above and pursuant to the CSA, it is hereby stipulated by the Parties, and the  
5 Parties move the Court, for an Order (as set forth in the attached Proposed Order)  
6 that:

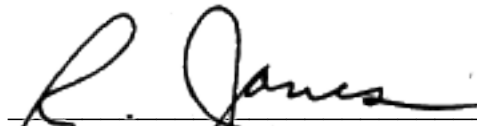
- 7
- 8 1) Plaintiff's claims as to Mitchell's activities as alleged in the Complaint are  
9 dismissed with prejudice, subject to the conditions set forth above, in the  
10 CSA, and subject to compliance with the CSA;
  - 11 2) The Court retains jurisdiction over this matter to hear any dispute involving  
12 the CSA including any breach or violation of the CSA.
  - 13 3) That the CSA and all exhibits thereto be filed under seal with the court  
14 subsequent to the entering of this order.
- 15

16 **ORDER OF DISMISSAL**

17 IT IS HEREBY ORDERED that the Clerk of the Court shall CLOSE this  
18 case.

19 IT IS FURTHER ORDERED that the Court will retain jurisdiction over this  
20 matter until November 30, 2022 to enforce the terms of the parties' Confidential  
21 Settlement Agreement.  
22

23 DATE: October 18, 2022.  
24

25   
ROBERT C. JONES  
United States District Judge